

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF  
ALLEGIANCE TELECOM OF MASSACHUSETTS, INC. TO  
VERIZON MASSACHUSETTS

D.T.E. 02-8

Pursuant to 220 C.M.R. 1.06(b)(c), Allegiance Telecom of Massachusetts, Inc. (“Allegiance”) submits to Verizon Massachusetts (“Verizon” or “Verizon MA”) the following information requests.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon or to any individual or entity sponsoring testimony or retained by Verizon to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as may be available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response that is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If Verizon cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why Verizon cannot answer the Request in full, and state what information or knowledge is in Verizon's possession concerning the unanswered portions.
10. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide Allegiance with the responsive documents, and or which directs Allegiance to inspect documents at any location is not responsive.

13. If you refuse to respond to any Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. Unless the Request specifically provides otherwise, the term "Verizon" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated February 27, 2002.

### INFORMATION REQUESTS

AL-VZ-1-1: For each central office in which at least one CLEC is collocated, please provide the following:

- (a) the address and any other identifying name of the CO;
- (b) a diagram of the floor plan of each CO, identifying (i) areas occupied by CLEC equipment only, (ii) areas occupied by Verizon equipment only; (iii) areas occupied by intermingled CLEC and Verizon equipment; (iv) the location of shared facilities, e.g., loading docks, staging areas, and restrooms; and (v) the path taken by CLEC employees, agents, and vendors to gain access to CLEC equipment and shared facilities;
- (c) a copy of the CO-specific security plan, if one exists. If one does not exist, please provide a copy of the security plan that otherwise applies to the CO;
- (d) the number of CLECs collocated at the CO;
- (e) the number of CLEC employees, agents, or vendors that have visited the CO in each month in which CLEC equipment has been collocated there, and the total number of such visits;
- (f) the number of Verizon employees, agents, and vendors who have visited the CO during those months, and the total number of such visits; and
- (g) the number of Verizon employees who are assigned to the CO on a permanent basis.

AL-VZ-1-2: Please refer to page 5 of Verizon's Panel Testimony where the witnesses state: "Verizon MA also plans to implement an in-depth, pre-screening of collocated carrier personnel designated to access physical collocation arrangement in its COs as a requirement of providing identification badges."

(a) Please elaborate as to the elements of this pre-screening process and how it will be implemented. Please indicate whether a pre-screening process will be implemented with respect to Verizon employees and outside vendors, and, if so, how the elements of the process or its implementation may differ for Verizon employees or outside vendors, as compared to the pre-screening process proposed for collocated carrier personnel. Provide copies of all documents related to the proposed pre-screening.

(b) Please explain how this proposed pre-screening process "is consistent with Verizon's more stringent pre-screening and background checks for its employees and vendors that are being adopted as part of its nationwide effort to enhance security in its COs since September 11<sup>th</sup>"? Please provide documentation regarding these "more stringent pre-screening and background checks. Please indicate whether Verizon is using "more stringent pre-screening" and "background checks" as a means of determining which Verizon employees and vendors should receive identification badges. If these

processes are not being used for purpose of issuing identification badges or are not being used exclusively for the purpose of issuing identification badges, please explain for what purposes pre-screening and background checks are being used. Please also explain if such pre-screening and background checks are being used in the same manner for Verizon employees and vendors. If not, how does its use differ?

(c) Please provide an estimate of the cost of this pre-screening process, both in terms of the costs associated with developing the process and the costs associated with implementing such a process. Please also explain how any such costs would be allocated.

(d) Is Verizon aware of any other pre-screening processes that have been used for purposes of issuing identification badges to collocated carrier personnel? If the answer to this question is yes, please provide a description of these processes, indicate where these processes are being employed, indicate whether these prescreening processes are implemented for collocated carrier personnel only, and provide any documentation available about these processes.

AL-VZ-1-3: Please refer to page 16 of Verizon's Panel Testimony where the witnesses state: "Verizon MA requests that the Department permit the Company to establish the proposed *pro-active* security procedures that would secure and segregate....the telecommunications network infrastructure from harm....", and that "the Department should join with Verizon to ensure that additional security measures can be implemented, and seek appropriate changes to FCC rules, if necessary."

(a) In Verizon's view, which, if any, of the proposed security measures set forth in the Panel Testimony can the Department adopt as part of this proceeding? For each such measure specified, please explain why Verizon holds this view and provide citations, as necessary.

(b) In Verizon's view, which, if any, of the proposed security measures set forth in the Panel Testimony can be adopted only if the FCC changes its rules? For each such measure, please explain why Verizon holds this view and provide citations, as necessary.

AL-VZ-1-4: Please refer to page 17 of Verizon's Panel Testimony where the witnesses lay out five different security methods for providing access to CLECs to collocated space and shared facilities.

(a) For each CO where collocation occurs, please indicate which of the five security methods are employed. For each such CO, please explain why a particular security measure or combination of measures has been chosen.

(b) Has Verizon developed criteria for determining which of the five stated security measures should be employed at a CO? If so, please provide a list of these criteria.

AL-VZ-1-5: Please refer to page 19 of Verizon's Panel Testimony where, in discussing alleged problems with the use of cameras for security purposes, the witnesses state: "since CLECs can access

COs 24 hours a day, seven days a week, a minimum of four guards per collocated CO (or one per shift) would be required to provide real-time monitoring.”

(a) Please clarify what the witnesses mean by the term “per collocated CO”?

(b) Has Verizon estimated the costs associated with real-time monitoring of COs where collocation occurs? If so, please provide an estimate of these costs, broken down by individual CO.

AL-VZ-1-6: Please refer to page 20 of Verizon’s Panel Testimony where the witnesses state: “Verizon is aware of instances where CLECs have not reported lost access cards or returned cards given to former employees and representatives.”

(a) For each such instance involving the loss or failure to return a Verizon-issued card, please provide (1) the date Verizon learned that an access card was lost or not returned; (2) the nature of the problem, *i.e.*, card lost, card not returned; (3) a description of how and when the problem was resolved, *i.e.*, card returned, card found, card cancelled; (4) a description of any security consequences associated with the lost or unreturned card; and (5) any written documentation regarding the occurrence and resolution.

(b) For each of the three most recent calendar years (1999, 2000, 2001), please provide the number of access cards that were issued (or renewed) to CLEC personnel for purposes of accessing Verizon facilities in Massachusetts and the number of instances where lost cards were not reported or cards given to former CLEC employees or representatives were not returned.

AL-VZ-1-7: Please refer to page 20 of Verizon’s Panel Testimony where the witnesses state “Verizon is also aware of CLEC personnel or agents using cards belonging to others.”

(a) For each such instance involving the use of another employee’s access card, please provide (1) the date and location of the instance; (2) a description of the circumstances involved; (3) a description of how and when the problem was resolved; (4) a description of any security consequences associated with the infraction; and (5) any written documentation regarding the occurrence and resolution.

(b) With respect to footnote 18 on page 20, please explain the security consequences associated with unmonitored secondary exits that serve only as exits. Please indicate whether these secondary exits are locked for purposes of preventing entry.

AL-VZ-1-8: Referring to page 21 of Verizon’s Panel Testimony, please explain whether measures are in place which prevent individuals from “tailgating” Verizon employees entering areas requiring card access. If so, please explain what these measures entail and whether similar measures could be employed to prevent the “tailgating” of CLECs or vendors.

AL-VZ-1-9: Referring to page 23 of Verizon's Panel Testimony, in which the witnesses propose "relocating existing *unsecured* CCOE arrangements to secured, separated areas, where space permits, or otherwise converting them to virtual collocation arrangements," in which central offices does Verizon contend that relocating CCOE arrangements to "secured, separated areas" would not be feasible? Produce all documents related to Verizon's analysis in concluding that such relocation would not be feasible.

AL-VZ-1-10: Referring to page 27 of Verizon's Panel Testimony, in which the witnesses propose that "[i]n those cases where new physical collocation arrangements cannot be provided in segregated CLEC areas with separate entrances, virtual collocation arrangements should be required," in which central offices does Verizon contend that future collocation arrangements should only be virtual? Produce all documents related to Verizon's analysis in concluding that physical arrangements would not be feasible at those central offices in the future.

AL-VZ-1-11: Referring to page 27 of Verizon's Panel Testimony, in which the witnesses state that "Verizon MA believes that a higher, yet reasonable, degree of security is required to ensure full network reliability, and can only be attained if collocators are located in separate and segregated areas of the CO," please identify the date on which Verizon MA management first concluded that the degree of security extant in Verizon MA facilities did not "ensure full network reliability." Also, please identify the specific individuals who reached that conclusion, and produce all of the documents they relied upon in reaching that conclusion.

AL-VZ-1-12: Referring again to page 27 of Verizon's Panel Testimony, in which the witnesses state that "Verizon MA believes that a higher, yet reasonable, degree of security is required to ensure full network reliability, and can only be attained if collocators are located in separate and segregated areas of the CO," please identify all other security options considered and rejected by Verizon MA before concluding that "full network reliability . . . can only be attained if collocators are located in separate and segregated areas of the CO." Also, please identify the specific individuals who considered and rejected these other options and produce all documents reviewed or relied upon by them in reaching that conclusion.

AL-VZ-1-13: Referring to page 28 of Verizon's Panel Testimony, in which the witnesses state, in referring to the Verizon "Safe Time" policy, "[t]hat safety policy would be undermined, and network security threatened, if separating or partitioning collocator equipment were not required, and collocator personnel could access unsecured equipment any time of the day," please identify the date on which Verizon management first concluded that network security would be threatened "if separating or partitioning collocator equipment were not required, and collocator personnel could access unsecured equipment any time of the day." Also, please identify the specific individuals who reached that conclusion, and produce all of the documents they relied upon in reaching that conclusion.

AL-VZ-1-14: Referring to page 30 of Verizon's panel testimony, in which the witnesses state, "[c]ommingling of Verizon MA's and CLEC's equipment in the same unpartitioned equipment area presents insurmountable security problems," please identify the date on which Verizon management first concluded that "[c]ommingling of Verizon MA's and CLEC's equipment in the same unpartitioned equipment area presents insurmountable security problems." Also, please identify the specific individuals who reached that conclusion and produce all documents they relied upon in reaching that conclusion.

AL-VZ-1-15: Please identify with specificity any breaches of security experienced by Verizon MA, dating from the time of the first collocation by a CLEC in a Verizon central office, that Verizon MA attributes to commingling of Verizon MA equipment with CLEC. For each such incident, please identify the date and location of the security breach, and the Verizon employee responsible for investigating the security breach, and produce all documents related to the security breach or Verizon's investigation of it.

AL-VZ-1-16: Please refer to footnote 25 on page 31 of Verizon's Panel Testimony.

(a) How many times over the last three calendar years (1999, 2000, 2001) has Verizon terminated or taken steps to terminate one of its own employees, vendors or employee of a vendor for accidentally causing damage in one of its COs? For each such instance, please provide the date, location and nature of the accidental damage; the date on which Verizon initiated action to terminate; and the date on which the employee or vendor was terminated (or, in the event the employee was not terminated, the date and nature of the resolution of Verizon's action with respect to that employee or vendor.) For each such instance, please also provide any documentation that establishes that the employee, vendor or employee of a vendor was terminated or that Verizon initiated action to terminate an employee or vendor.

(b) Please provide all employment contracts, union contracts and other documents or agreements which set forth the process by which Verizon may terminate an employee or vendor for accidentally causing damage to one of its COs. In answering this question, please cite or otherwise indicate all terms in the contracts, documents or agreements which (1) demonstrate that Verizon has the ability to terminate employees or vendors for accidentally causing damage to its COs, and (2) set out the process by which Verizon can terminate employees or vendors on these grounds.

(c) How many times over the last three calendar years (1999, 2000, 2001) has Verizon terminated or taken steps to terminate one of its own employees or vendors for intentionally causing damage in one of its COs? For each such instance, please provide the date, location and nature of the intentional damage; the date on which Verizon initiated action to terminate; and the date on which the employee or vendor was terminated (or, in the event the employee was not terminated, the date and nature of the resolution of Verizon's action with respect to that employee or vendor.) For each such instance, please also provide any documentation that establishes that the employee or vendor was terminated or that Verizon initiated action to terminate an employee or vendor.

(d) Please explain how the Verizon's inability to terminate CLEC or agents creates a "disincentive" for CLEC employee or agents "to follow proper procedures and exercise care and caution when working around Verizon MA's equipment."

(e) Please indicate all instances in which CLEC employees or agents have accidentally or intentionally caused damage to one of Verizon's COs. For each such instance, please provide the date, location and nature of the damage; the CLEC that allegedly caused the damage; whether Verizon considered the damage to be caused accidentally or intentionally; and any documentation regarding the

incident. For each such instance, please also indicate whether Verizon contacted the CLEC involved about the damage, and/or whether Verizon made any demands or recommendations regarding continued employment of that employee or agent by the CLEC. If such contact was made, please provide any documentation regarding that contact.

(f) Please indicate all instances in which Verizon employees, vendors or agents have accidentally or intentionally caused damage to Verizon COs, from January 1999 to the present. For each such instance, please provide the date, location and nature of the damage; whether Verizon considered the damage to be caused accidentally or intentionally; and any documentation regarding the incident.

AL-VZ-1-17: Does Verizon employ cleaning crews in its Massachusetts central offices? If so, do these crews clean secure and unsecured areas? What security clearance must each member of a cleaning crew possess in order to gain entrance to each type of area?

AL-VZ-1-18: Referring to page 33 of Verizon's panel testimony, in which the witnesses state, "[i]t is virtually impossible to provide adequate security for Verizon MA's facilities in an unsecured environment where CLEC personnel is allowed 24 hour a day, seven days a week unescorted access," please identify the date on which Verizon management first concluded that "[i]t is virtually impossible to provide adequate security for Verizon MA's facilities in an unsecured environment where CLEC personnel is allowed 24 hour a day, seven days a week unescorted access." Also, please identify the specific individuals who reached that conclusion and produce all documents they relied upon in reaching that conclusion.

AL-VZ-1-19: Referring to page 33 of Verizon's panel testimony, in which the witnesses state "Verizon MA estimates that approximately 13 of the 27 CCOE arrangements in Massachusetts are placed in unsecured areas within nine COs," please identify the nine central offices referred to, the specific measures Verizon proposes for those central offices, and the approximate cost of implementing those measures.

AL-VZ-1-20: Please refer to page 39 of Verizon's Panel Testimony where the witnesses state that Verizon proposes to convert certain "critical" CO sites to sites that would provide virtual collocation only, even if physical collocation space were otherwise available.

(a) Please discuss how Verizon proposes to "work with the Department" to identify these "critical" sites. Is Verizon proposing to work with the Department to identify such sites outside of an adjudicatory or other regulatory review process where CLECs and other entities can present testimony or comment on issues related to identification and conversion of such sites?

(b) With respect to the first "key factor" currently identified by Verizon for determining which COs might be selected as "critical", please explain what types of switches or signaling elements housed in a CO would qualify that CO for "critical" status under Verizon's proposal.

(c) With respect to the second "key factor" identified by Verizon for determining which COs might be selected as critical, please identify which airports, military installations, government agencies and nuclear power plants in Massachusetts would qualify as "critical customers" under Verizon's

proposal. For each such “critical customer”, please identify the associated CO or COs that would qualify as “critical” for purposes of serving that customer.

(d) With respect to the third “key factor” identified by Verizon for determining which COs might be selected as critical, please indicate what specific number of access lines and/or special services circuits would operate as a threshold for determining which COs are “critical”. For each CO where collocation occurs, please provide the number of access lines and special services circuits.

(e) If it is the case that Verizon proposes that the three key factors for determining which COs might be selected as “critical” are to be applied interactively, please explain how Verizon would apply these three factors interactively to determine whether a CO is critical.

AL-VZ-1-21: For each CO in which Verizon maintains that CLEC equipment would have to be relocated in order to ensure the security of Verizon equipment, please indicate (a) whether all or some relocated CLEC equipment would remain in the CO building, (b) if any equipment would be moved out of the CO building, where it would be moved; (c) the distance between the closest relocated CLEC equipment and Verizon equipment; and (d) the approximate cost to implement the move, including the cost to prepare the separate space and to move the equipment.

AL-VZ-1-22: Is it Verizon’s contention that CLECs should bear all of the costs involved in implementing the proposals contained in the panel testimony? If not, in what manner should costs be shared between CLECs and others?

AL-VZ-1-23: Does Verizon believe that any cost/benefit analysis should be applied to the proposed measures? If so, what should be the criteria for determining whether the cost of implementing a particular measure outweighs the benefits that will likely be achieved through that measure?

AL-VZ-1-24: Since September 11, 2001, has Verizon undertaken a review of the security plans that cover its Massachusetts central offices to identify measures that would enhance the protection of those facilities from intentional or accidental damage of any origin? If so, which, if any, additional security measures have been implemented? Have any potential measures that were identified not been implemented and, if not, why not? Were any potential additional security measures rejected or not implemented because their cost would outweigh the benefits that the measures would bring? What criteria did Verizon apply in determining whether a particular measure should be implemented? What criteria did Verizon apply in determining whether a particular measure was cost-justified, if cost was a factor at all in its decision-making?

AL-VZ-1-25: Is Verizon in possession or aware of any evidence that, since September 11, 2001, CLEC employees, agents, or vendors are more likely to engage in conduct that would pose a threat to equipment located in Verizon central offices where the CLEC is collocated than they were before September 11, 2001? If so, please identify all such evidence and produce copies of any documents constituting or related to such evidence.

AL-VZ-1-26: Please produce all documents that are in any way related to, in whole or in part, collocation security, and that were filed by Verizon in any of the following proceedings:

- (a) Covad/Bell Atlantic Arbitration, DTE 98-21;
- (b) Teleport Petition, D.T.E. 98-58;
- (c) Verizon Massachusetts Tariff Filing, D.T.E. 98-57 (all phases);
- (d) Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 (FCC) (including all phases); and
- (e) G.T.E. Services Corporation, et al. v. Federal Communications Commission, No. 99-1179 (United States Circuit Court of Appeals for the D.C. Circuit).